EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DYFAN, LLC,	:	
	:	
Plaintiff,	:	
	:	C.A. No. 6:19-cv-00179-ADA
v.	:	
	:	
TARGET CORPORATION,	:	
	:	
Defendant.	:	
	:	

DEFENDANT'S DISCLOSURES PURSUANT TO SCHEDULING ORDER (DKT. #26)

Pursuant to the Scheduling Order (*see* Dkt. 26), Defendant Target Corporation ("Defendant"), in the above-listed case provide the following disclosures regarding claims 1-4, 7, 9, 11-19, and 23-30 of U.S. Patent No. 9,973,899 (the "'899 Patent") and claims 1-8, 10-21, and 23-30 of U.S. Patent No. 10,194,292 (the "'292 Patent") (collectively referred to herein as the "Asserted Patents" or "Asserted Claims").

The proposed terms, phrases, or clauses for construction in Exhibit A address the claims of the Asserted Patents that Dyfan, LLC ("Plaintiff") asserted against Defendant pursuant to their Infringement Contentions. The proposed terms, phrases, or clauses are identified for construction wherever they appear in any claim element, including all dependent claims or claims where multiple terms appear in combination. Defendant proposes only the terms and claim elements for construction that appear in the claims asserted against them in Plaintiff's Infringement

Contentions. Nothing in this disclosure shall be construed to waive Plaintiff's requirement to assert a claim against Defendants pursuant to Scheduling Order (Dkt. #26).

The proposed terms, phrases, or clauses for construction are based on information reasonably available to Defendant at this time. Defendant's investigation and discovery are ongoing, and Defendant therefore expressly reserves the right to amend, modify, and add to this list of terms based on continuing investigation and discovery.

Date: August 13, 2019

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document, **DEFENDANT'S INVALIDITY CONTENTIONS PURSUANT TO SCHEDULING ORDER (DKT. 26)** was served via electronic mail upon Dyfan's counsel of record on August 13, 2019.

/s/ *Gilbert A. Greene*

EXHIBIT A

Claim Term	'899 Claims	'292 Claims	Governed by 35 U.S.C. § 112(6)
"building"	1-3, 7, 9, 11-13, 15, 30	1, 4, 6, 13, 15, 19, 26, 28-30	
"facilities"	1-3, 7, 9, 11-13, 15	1, 4, 6, 13, 15, 19, 26, 28-30	
"shopping mall"	2, 7, 12, 30	4, 13, 26, 29	
"the one or more [plurality of] facilities include different private facilities associated with different brands [, and further include at least one public food court]"	2, 7, 12	13, 26, 29	
"an identifier including at least three fields"	1		
"messages including an address portion"	1, 7, 9, 11, 30	4	
"particular location-relevant information"	1, 7, 9, 11, 28-30		
"trigger"/"triggered"	1, 7, 9, 11, 30	4	
"option"	1, 7, 9, 11, 30	1, 4, 15, 28	
"in response to the indication of the receipt . . . send, from the at least on mobile device . . . at least one message"/ "in response to the receipt of indication of the receipt . . . and the at least one value . . . cause to be sent, at least one message"	1, 7, 9, 11, 18, 27, 30	1, 4, 8, 15, 21	

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Claim Term	'899 Claims	'292 Claims	Governed by 35 U.S.C. § 112(6)
"different location-relevant information"	1, 7, 9		
"different location-relevant information associated with different values"	1, 7, 9		
"controlling the one or more mobile device application actions"/ "control, utilizing the application, the one or more mobile device application actions"	1		
"output" / "causing to be output" / "cause to be output"	1, 4, 7, 9, 11, 14, 15, 18, 19, 25, 30	1, 4, 5, 8, 11, 12, 15, 18, 21, 24, 25, 28	
"influence whether the one or more mobile device actions is caused"	7, 9		
"permit a determination as to whether the one or more mobile device application actions including causing to be output the visual information is triggered"	11		
"an application [computer code] configured for[to be] execution [executed] by at least one of a plurality of mobile devices . . . the application when executed causes the at least one mobile device to [the computer code, when executed, configured to] [the application, when executed, configured to] . . . [cause] display of an option via a display of the at least one mobile device"	1, 7, 9, 11		X
"code configured to be executed by at least one of the plurality of mobile devices, the code, when executed, configured to . . . cause display, via a display of the at least one mobile device, of an option for causing first visual information and second visual information to be output via the at least one mobile device"		1, 15, 28	X
"an application [computer code] [code] configured for execution by at least one of a plurality of mobile devices . . . the application when executed causes the at least one mobile device to [the computer code, when executed, configured to] [the application, when executed, configured to] [the code, when executed, configured to] . . . receive	1, 7, 9, 11	1, 15, 28	X

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Claim Term	'899 Claims	'292 Claims	Governed by 35 U.S.C. § 112(6)
an indication of a receipt [, without solicitation] from the at least one [first] broadcast short-range communications unit and via the Bluetooth [short-range first] [first] wireless communications protocol, of the one or more [first broadcast] messages including [the address portion and the identifier including the at least three fields [, the at least three fields,] [, the plurality of fields, and]] the at least one [first] value"			
"code configured to be executed by at least one of the plurality of mobile devices, the code, when executed, configured to . . . receive an indication of a receipt, from the second broadcast short-range communications unit and via the first wireless communications protocol, of the one or more second broadcast messages including the at least one second value"		1, 15, 28	X
"said application, when executed, further configured to cause the at least one mobile device to . . . in response to the receipt, from the at least one server and via the another wireless communications protocol, of the response message including the particular location-relevant information; control, utilizing the application, the one or more mobile device application actions of the application including causing to be output, via the at least one mobile device, the mobile device application visual information based on the particular location-relevant information"	1		X
"said application [computer code] [code], when executed, further configured to . . . in response to [after] the receipt, from the at least one server and via the second wireless communications protocol, of the response message including the particular [first] location-relevant information [from the at least one server and via the second wireless communications protocol] [and the second location-relevant information]: cause, utilizing the application [computer code], the one or more mobile device application actions [of the application] [the one or more mobile device actions] including causing to be output, via the at least one mobile device, the visual information based on the particular location-relevant information [: cause to be output, via the at least one mobile device, the first visual information based on the first location-relevant information]"	7, 9, 11	1	X

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Claim Term	'899 Claims	'292 Claims	Governed by 35 U.S.C. § 112(6)
"said code, when executed, further configured to . . . in response to the receipt, from the at least one server and via the second wireless communications protocol and the Internet Protocol over the Internet at least in part, of the first response message including the first location-relevant information [of the first location-relevant information]: cause to be output, via the at least one mobile device, the first visual information based on the first location-relevant information"		15, 28	X
"said code, when executed, further configured to . . . after the receipt, from the at least one server and via the second wireless communications protocol, of the response message including the first location-relevant information and the second location-relevant information; after the first visual information is caused to be output based on the first location-relevant information; and after the at least one mobile device is moved in the building: cause to be output, via the at least one mobile device, the second visual information based on the second location-relevant information"		1	X
"said code, when executed, further configured to . . . after the first visual information is caused to be output based on the first location-relevant information; after the at least one mobile device is moved in the building; and in response to the receipt, from the at least one server and via the second wireless communications protocol, of the second response message including the second location-relevant information: cause to be output, via the at least one mobile device, the second visual information based on the second location-relevant information"		15	X
"said code, when executed, further configured to . . . after the receipt, from the at least one server and via the second wireless communications protocol, of the second location-relevant information; after the first visual information is caused to be output based on the first location-relevant information; and after the at least one mobile device is moved in the building: cause to be output, via the at least one mobile device, the second visual information based on the second location-relevant information"		28	X
"the system is configured such that, after the indication of the user	1, 7, 9		X

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Claim Term	'899 Claims	'292 Claims	Governed by 35 U.S.C. § 112(6)
input is received and after an initial instance of the output of the mobile device application visual information including the image [the output of the visual information] is caused, subsequent instances of the output of the mobile device application visual information including different images [the output of the visual information] are capable of being caused as a user moves among a plurality of the facilities of the building [as a user moves,], without requiring [necessitating] additional subsequent user input"			
"the system is further configured such that, after the indication of the user input is received and after the output of the visual information is caused, subsequent output of different visual information is caused as the at least one mobile device is moved among a plurality of the facilities of the building"	11		X
"the system is further configured such that the option and the user input permit the user to determine whether the control of the one or more mobile device application actions is triggered"	1		X
"the system is further configured [configured] such that the option and the user input permit the user to influence whether the one or more mobile device actions is caused"	7, 9		X
"the application, when executed, is configured to permit a determination as to whether the one or more mobile device application actions including causing to be output the visual information is triggered"	11		X
"the system is configured such that different brand-specific [product-type-specific] visual information is caused to be output as the user moves among the plurality of facilities of the shopping mall [among the different locations of the retail store]"	7, 9		X
"the system is configured such that the output of the mobile device application visual information [the visual information] is [the first visual information and the second visual information are] conditionally caused based on whether a mobile device-specific threshold has been met"	4, 14	5, 18	X

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Claim Term	'899 Claims	'292 Claims	Governed by 35 U.S.C. § 112(6)
"the system is configured such that, after the receipt of the indication of the user input, the [first] visual information is automatically caused to be output, in response to the receipt of the indication of the receipt of the one or more [first broadcast] messages that are broadcasted after the receipt of the indication of the user input [, and the second visual information is automatically caused to be output in response to the receipt of the indication of the receipt of the one or more second broadcast messages that are broadcasted after the receipt of the indication of the user input."	18	8, 21	X
"the system is configured such that the visual information is automatically caused to be output without requiring further communication with the at least one broadcast short-range communications unit, after the receipt of the indication of the receipt of the one or more messages"	19		X
"the system is configured such that the first visual information is automatically caused to be output without requiring communication of the at least one [first] message with the first broadcast short-range communications unit after the receipt of the indication of the receipt of the one or more first broadcast messages, and the second visual information is automatically caused to be output without requiring communication of the at least one [second] message with the second broadcast short-range communications unit after the receipt of the indication of the receipt of the one or more second broadcast messages"		1, 15, 28	X
"the system is configured such that the one or more mobile device application actions is based on user feedback information received from a user of the at least one mobile device"	23		X
"the system is configured such that both the first visual information and the second visual information are output based on user feedback information received from a user of the at least one mobile device"		11, 25	X
"the system is configured such that the subsequent output of the different visual information is capable of being caused without additional user input after the user input"	25		X

Claim Term	'899 Claims	'292 Claims	Governed by 35 U.S.C. § 112(6)
"the system is configured such that both the first visual information and the second visual information are output without additional user input after the user input"		12	X
"the system is configured such that the particular location-relevant information is located based on the at least on value"	28		X

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